

★ JUN 12 2019 ★

ALB:BTR
F.# 2019R00624
NYNYE756

LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

JUAN TAVERAS,

Defendant.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. CR - 19 0265
(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(A)(i), 841(b)(1)(C), 846,
853(a) and 853(p); T. 18, U.S.C.,
§§ 2 and 3551 et seq.)

SEYBERT, J.

TOMLINSON, M.J.

COUNT ONE

(Conspiracy to Possess Heroin and Cocaine with Intent to Distribute)

1. On or about and between January 1, 2019 and April 18, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JUAN TAVERAS, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of heroin involved in the conspiracy attributable to the defendant as a result of his own conduct,

and the conduct of other conspirators reasonably foreseeable to him, was one kilogram or more of a substance containing heroin.

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(i) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Possession of Heroin and Cocaine with Intent to Distribute)

2. On or about and between January 1, 2019 and April 18, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JUAN TAVERAS, together with others, did knowingly and intentionally possess with intent to distribute one or more a controlled substances, which offense involved (a) one kilogram or more of a substance containing heroin, a Schedule I controlled substance and (b) a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

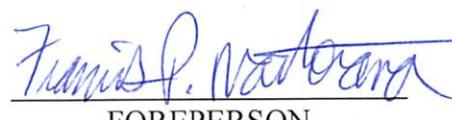
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON

Richard P. Donoghue
RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JUAN TAVERAS,

Defendant.

INDICTMENT

T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(i),
841(b)(1)(C), 846, 853(a) and 853(p);

A true bill.

Francis P. Maloney

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

BURTON T. RYAN, Assistant U.S. Attorney (631) 715-7853